

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**Richard Snyder**

**\* CA-07-00066 GMS**

**Plaintiff**

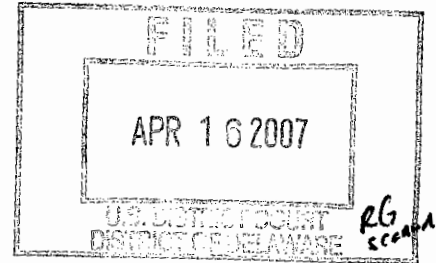
**\***

**v.**

**GPM2 et al.**

**Defendants**

**\***

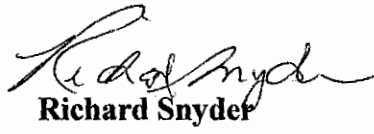


**OPPOSITION TO MOTION(S) TO DISMISS  
AMENDED COMPLAINT  
REQUEST FOR HEARING**

- 1. This complaint involves a frustrated contract to purchase real property.**
- 2. The seller (GPM2) agreed to certain terms and conditions which were breached by it.**
- 3. Seller subsequently sold the property to its' tenant (now doing business as Christy Management, a defendant). The lender (also a defendant), Felton Bank as well as the other defendants were at all times aware of plaintiff's equitable interest in the property.**
- 4. A title search by the "unknown title company" (also a defendant) failed to note the filing of a copy of the contract in the real property records of Sussex County, Delaware. This title company is now identified as First American Title and is represented by counsel also representing Christy Management and Felton Bank:**  
**J. Newcomer, Jr.**
- 5. Buyer had always been ready, willing, and able to purchase the property, including at the present time, and at the contract price today.**

(2)

6. Plaintiff seeks damages to be determined at trial or in the alternative, specific performance.
7. Plaintiff has lost the benefit of the bargain, as well as significant tax consequences of which the sellers were aware at the time of the agreement.
8. In amending the complaint, plaintiff desires to change the name of "unknown title company" to that of First American Title Company and to delete the name of Sergiovic & Ellis as defendant(s).
9. Plaintiff requests a trial on the merits. As well as a hearing on the Motion to Dismiss.



Richard Snyder

P.O. Box 374

Davidsonville, MD 21035      mail address

#### Certification of Service

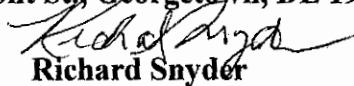
Copies of this pleading have been sent by first-class postage to GPM2, 7443 Lee Davis Highway #301, Mechanicsville, VA 23111

Christy Management LLC, First American Title, and Felton Bank c/o John Newcomer, Jr. 500 Delaware Ave #1500, Wilmington, DE 19801

James P Connor, Jr. at his address of record filed with the Sussex County Land records with respect to this transaction: 18977 Munchy Branch Rd. Rehoboth, DE 19971

Bonnie Benson, Pa 34385-B Carpenter's Way, Lewes, DE 19958

Seriovic & Ellis, PA 9 N. Front St., Georgetown, DE 19947



Richard Snyder

87-66 gms



BALTIMORE MD 212

12 APR 2007 PM 1 L

U.S. District Court  
844 King St.  
Wilmington DE  
19801

1550143513 0012